

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|   |   |                            |
|---|---|----------------------------|
| STERLING AND WILSON SOLAR SOLUTIONS INC., | ) |                            |
|   | ) |                            |
|   | ) |                            |
| Plaintiff,                                | ) | Case No. 3:23-cv-01110-MEM |
| v.  | ) | (Mannion, Judge)           |
|   | ) |                            |
| BANK OF AMERICA, N.A.,                    | ) |                            |
|   | ) |                            |
| Defendant.                                | ) |                            |

**LR 5.1(f) TABLE OF CONTENTS FOR EXHIBITS TO STERLING AND  
WILSON SOLAR SOLUTIONS INC.'S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to LR 5.1(f), Plaintiff Sterling and Wilson Solar Solutions Inc. (“Sterling”) submits this Table of Contents for the exhibits to its Motion for Temporary Restraining Order and Preliminary Injunction:

|                  |   |
|------------------|---|
| <b>Exhibit 1</b> | Declaration of Gaurav Bhandari & Exhibits A-F thereto   |
| <b>Exhibit A</b> | June 23, 2023 Demand by Montague Solar, LLC upon Bank of America, N.A. Letter of Credit   |
| <b>Exhibit B</b> | Engineering, Procurement and Construction Agreement by and between Sterling and Wilson Solar Solutions Inc. and Montague Solar, LLC (Motion for leave to file under seal forthcoming) |
| <b>Exhibit C</b> | April 19, 2023 Commercial Operation Certificate   |

**Exhibit D**

April 21, 2023 Correspondence  
Between Portland General Electric  
Company and Avangrid Inc.

**Exhibit E**

April 14, 2023 Certification of  
Commercial Operation

**Exhibit F**

April 21, 2023 Correspondence  
Between Portland General Electric  
Company and Avangrid Inc.<sup>1</sup>

**Exhibit 2**

Declaration of Bahadur Sam Dastoor

**Dated:** July 5, 2023

Respectfully submitted,

**Sterling and Wilson Solar  
Solutions Inc.**

/s/ Joseph V. Schaeffer  
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<sup>1</sup> Exhibit D inadvertently was attached to the Bhandari Declaration in duplicate as Exhibit F. Any references in the Bhandari Declaration to Exhibit F should be understood as references to Exhibit D.

*pro hac vice forthcoming*

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**CERTIFICATE OF SERVICE**

I certify that, on July 5, 2023, I filed the foregoing **LR 5.1(f) TABLE OF CONTENTS FOR EXHIBITS TO STERLING AND WILSON SOLAR SOLUTIONS INC.'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** with the Court's CM/ECF system and caused a copy of the same to be served in the following manner:

**Certified Mail**

Bank of America, N.A.  
c/o CT Corporation System  
600 North 2nd Street, Suite 401  
Harrisburg, PA 17101

**First Class U.S. Mail, Postage Prepaid**

Bank of America, N.A.  
Attn: General Counsel  
Bank of America Corporate Center  
100 North Tryon Street  
Charlotte, NC 28255

/s/ Joseph V. Schaeffer  
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